

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS LETTER BRIEF
OPPOSING DEFENDANTS' REQUEST
TO FILE A SUR-REPLY IN SUPPORT OF
WAYMO'S MOTION TO COMPEL**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal confidential information in its May 17, 2017 Letter Brief opposing Defendants’ Request to File a Sur-Reply in Opposition to Waymo’s Motion to Compel and Exhibit 1 thereto, filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the document as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted in Blue	Defendants
Exhibit 1 to Letter Brief	Highlighted in Blue	Defendants

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. UBER’S CONFIDENTIAL INFORMATION

Waymo only seeks to seal the portions of the Letter Brief (highlighted blue) and Exhibit 1 thereto as identified in the table above, because Waymo believes such information is considered confidential or non-public by one or more Defendants. Declaration of Lindsay Cooper (“Cooper Decl.”) ¶ 3. Waymo takes no position as to the merits of sealing any of Defendants’ designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s administrative motion to file under seal.

1 DATED: May 17, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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3 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

4 Attorneys for WAYMO LLC